

EXHIBIT 1

News Plaintiffs' Proposal: Coordination Among Consolidated News Cases Only¹

Issue	Terms
Scope of Coordination / Safety Valve Depositions	<ul style="list-style-type: none"> • Absent good cause, no individual is deposed more than once across the Consolidated News Cases, unless designated as a Rule 30(b)(6) witness or an expert who issues reports in multiple cases • No Safety Valve Depositions
Cross-Production	<ul style="list-style-type: none"> • Documents and written discovery cross-produced by Defendants across Consolidated News Cases (already ordered by the Court)
Plaintiff Side Allotted Hours	<ul style="list-style-type: none"> • 280-hour cap to be shared by the News Plaintiffs • Maximum of 200 hours per Defendant Group² • Maximum of 50 hours for non-party fact witnesses • This cap includes time for third-party depositions and Rule 30(b)(6) depositions
Defendant Side Allotted Hours	<ul style="list-style-type: none"> • 250-hour cap to be shared by Defendants across Consolidated News Cases, with a maximum of 200 hours for Plaintiffs' witnesses and 50 hours for non-party fact witnesses. • No more than 100 hours from any one Individual News Plaintiff. "Individual News Plaintiff" means The New York Times in the <i>New York Times</i> case and the publishers collectively in the <i>Daily News</i> case.
Per-Witness Time Limits (for depositions taken of Defendants' 30(b)(1) witnesses)	<ul style="list-style-type: none"> • Time limit of 10 hours per witness (if solely in individual capacity), to be shared by the News Plaintiffs as they see fit
Rule 30(b)(6) notices	<ul style="list-style-type: none"> • News Plaintiffs will serve consolidated 30(b)(6) notices • Defendants will serve consolidated 30(b)(6) notices • News Plaintiffs may serve up to three 30(b)(6) notices on the OpenAI Defendants, one of which must be limited to custodial topics, and up to two 30(b)(6) notices on Microsoft, one of which must be limited to custodial topics. "Custodial topics" include the storage and retention of information, employee use of software, programs, or tools, the structure of the relationship between Defendants, the organizational structure of Defendants, and other topics not directly related to the merits of the case that may reasonably inform or cabin subsequent discovery. • Defendants may serve one consolidated 30(b)(6) notice for each distinct entity among Plaintiffs in the News Cases.
Rule 30(b)(6) time	<ul style="list-style-type: none"> • If any Defendant Group designates two or fewer individuals to testify regarding all topics set forth in a Rule 30(b)(6) notice, the News Plaintiffs are entitled to at least 20 hours of testimony from those individuals or individual. • News Plaintiffs may take no more than 30 hours of 30(b)(6) deposition testimony from each Defendant Group

¹ The Consolidated News Cases include: *The New York Times Co. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:23-cv-11195) and *Daily News, LP, et al. v. Microsoft Corp., et al.*, (S.D.N.Y. No. 1:24-cv-3285). Proposal 1A is being made on behalf of the Plaintiffs in the Consolidated News Cases (the "News Plaintiffs").

² The two Defendant Groups are: (1) OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (the "OpenAI Defendants"); and (2) Microsoft Corporation. Hours caps for Party witnesses include depositions of Party-Affiliated witnesses, including former officers, directors, and/or employees of a Party.

	<ul style="list-style-type: none">• Defendants may take no more than 30 hours of 30(b)(6) deposition testimony in each Consolidated News Case
Expert Depositions	<ul style="list-style-type: none">• This agreement does not apply to and shall not limit the number and duration of depositions of experts.• The Parties shall endeavor to negotiate in good faith a separate protocol governing expert depositions.